

Steven Moser

From: Adam Weiss <adam@acweisslaw.com>
Sent: Tuesday, August 18, 2020 1:12 PM
To: Steven Moser
Subject: CHRISTINE D. GEOGHEGAN V. ROBSCOT REALTY INC.
Attachments: Offer of Judgment.pdf

Dear Steven,

Attached please find a Rule 68 Offer of Judgment. I'm sorry we weren't able to resolve the case through mediation, but perhaps this final offer will interest you and your client.

Let me know,

Adam

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
CHRISTINE D. GEOGHEGAN,

Plaintiff,

Case No.: 18-cv-07180

OFFER OF JUDGMENT

-against-

ROBSCOT REALTY, INC., d/b/a Brody McKay's
Tavern, PETITE REALTY CORP., and ROBERT
PETITPAIN,

Defendants.

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To: Steven Moser, Esq.
Counsel for Plaintiffs

Defendants, ROBSCOT REALTY, INC., d/b/a Brody McKay's Tavern, PETITE REALTY CORP., and ROBERT PETITPAIN, by and through their attorneys, (hereinafter "Defendants"), hereby offer, pursuant to Fed. R. Civ. P. 68, to allow Plaintiff, CHRISTINE D. GEOGHEGAN, to take judgment against Defendants for the total amount of \$12,000.00 (twelve thousand dollars) plus reasonable attorneys' fees, costs accrued to this date and expenses to be determined by the Court, to be paid within 30 days of entry of final judgment.

Acceptance of this offer of judgment will act to release and discharge Defendants, their successors or assigns, and all past and present employees, shareholders, directors, officers, members, representatives, managers, and agents from any and all claims that were, or could have been, alleged by Plaintiffs in the above-captioned civil action.

This offer is made in reliance upon the protections contained in Rule 68 and, if not accepted, may not be admitted as evidence in a proceeding to determine costs. If you do not serve written notice that this offer is accepted within 14 days after service, this offer will be deemed withdrawn, with the consequences described in Rule 68.

Dated: August 18, 2020
Glen Cove, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'AW' followed by a stylized flourish.

Adam C. Weiss (AW-5752)
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Attorneys for Defendants